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VIA ELECTRONIC FILING:

Hon. Gary Stein
United States District Court
Southern District of New York
500 Pearl Street, Room 702
New York, NY 10007

September 19, 2024

Re: Charles Kenyatta Jr. v. Caresha Brownlee, Case No. 1:24-cv-00691

Dear Judge Stein:

I represent Defendant Caresha Brownlee (“Ms. Brownlee”) in the above-captioned action. I write jointly with Plaintiff Charles Kenyatta, Jr. (“Mr. Kenyatta”) to provide a status update to the Court, as required under the Case Management Plan and Scheduling Order entered July 17, 2024 (Dkt. No. 25) (the “Scheduling Order”).

The parties have timely exchanged initial disclosures and their first set of discovery demands in accordance with the deadlines set forth in the Scheduling Order, and anticipate timely serving their responses and objections thereto. The parties have also been corresponding with respect to the terms of a proposed protective order. While the parties hope to agree to those terms, should motion practice be necessary, Ms. Brownlee anticipates filing a motion for entry of the protective order within the next one to two weeks, and Mr. Kenyatta anticipates filing his opposition 14 days later.

The parties anticipate timely noticing and conducting depositions as set forth in the Scheduling Order and meeting all other existing discovery and pre-trial deadlines.

No further settlement discussions have taken place, and the parties do not anticipate having any such discussions until later on in the discovery process.

Thank you very much for your time and consideration.

Respectfully submitted,

/s/ Anne L. Melton
Anne L. Melton



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***ATTORNEYS FOR DEFENDANT
CARESHA BROWNLEE***

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PRO SE PLAINTIFF



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was electronically filed using the Court's electronic filing system this 19th day of September, 2024, and sent to Plaintiff via first class mail at the address stated below and via email to Plaintiff's spouse and his Power of Attorney at charliecthageneral@gmail.com.

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/s/ Anne L. Melton

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